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## Counsel for Defendant Ochoa

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA, ) No. CR-21-70785-MAG  
Plaintiff, ) STIPULATION TO CONTINUE STATUS  
vs. ) HEARING; [PROPOSED] ORDER  
CHANDLER OCHOA, )  
Defendant. )

It is hereby stipulated, by and between counsel for the United States and counsel for the defendant Chandler Ochoa, that the Status Hearing regarding arraignment, currently set on February 24, 2022, be continued, and that the matter be set for a Status Hearing regarding arraignment on March 23, 2022, at 2:00 p.m.

The reason for this request is that the Mr. Ochoa continues to do well while on Pretrial supervision. Additionally, the defense continues to investigate this case, and is anticipating additional discovery that will be produced by the government.

The parties agree and stipulate herein that time shall be waived under Rule 5.1(c) (time for a preliminary hearing) and 18 U.S.C. § 3161(b) (requiring any information or indictment be filed and defendant arraigned within 30 days of arrest). The Parties further agree that this waiver of time is necessary for review of discovery by the defense and to discuss possible pre-indictment resolution of the case.

Accordingly, the parties hereby stipulate that there is good cause to continue this matter,

1 and requests that time be excluded in this matter through and including March 23, 2022, and  
2 further agree that the defendant has waived time for purposes of 18 U.S.C. § 3161(b) and Rule  
3 5.1(c), specifically, that time be waived from February 24, 2022 to March 23, 2022, for purposes of  
4 18 U.S.C. § 3161(b) and Rule 5.1(c), that the preliminary hearing need not occur until March 23,  
5 2022, and that defendant need not be arraigned on an information or indictment until March 23,  
6 2022.

7 The undersigned Assistant Federal Public Defender certifies that she has obtained approval  
8 from counsel for the government to file this stipulation and proposed order.

9 IT IS SO STIPULATED.  
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GEOFFREY HANSEN  
Acting Federal Public Defender

11 Dated: February 24, 2022

/s \_\_\_\_\_  
12 Severa Keith  
13 Assistant Federal Public Defender

14 STEPHANIE HINDS  
15 United States Attorney

16 Dated: February 24, 2022

/s \_\_\_\_\_  
17 Jeffrey Backhus  
18 Assistant United States Attorney

1 [PROPOSED] **ORDER**

2 Based upon the facts set forth in the stipulation of the parties and for good cause shown,  
3 IT IS HEREBY ORDERED that the Status Hearing in this matter, currently set for February 24,  
4 2022, shall be continued, and that this matter will be set for a Status Hearing regarding  
5 arraignment on March 23, 2022.

6  
7 IT IS SO ORDERED.  
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9 Dated \_\_\_\_\_, 2022  
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11 HON. NATHANIEL COUSINS  
12 United States Magistrate Judge  
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